



Increase Dangerous Waste Inspections to Help Business Compliance

Lean Project Progress Report: August 28, 2012

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Event Date:	May 21-24, 2012		
Background	Mismanagement of hazardous waste allows toxic chemicals to contaminate our water, soil, air, and stormwater runoff, and creates cleanups. Routine inspections are a critical regulatory line of defense between the millions of pounds of dangerous waste produced in Washington and environmental contamination. Budget reductions over the past ten years have reduced the number of compliance inspections we are able to do, resulting in a high rate of significant violations and greater risk to human health and the environment.		
Project Objective(s)	<ul style="list-style-type: none"> • Cut staff time spent on pre and post inspections, resulting in a 10-15 percent increase in the number of dangerous waste inspections at medium and large quantity generators. • Contribute to the long-term program goal of reducing the chance of finding a significant violation during an inspection to under 30 percent. 		
Lean Event Outcome	Current Situation (Old Way)	Future (New Way)	Benefits
	No pre-inspection notice may contribute to more violations found during inspections.	Pilot a reminder of impending inspection, including a pre-inspection checklist	Gives facilities a chance to resolve potential violations before inspection, saving time during and post inspection.
	Unconsolidated resources add unnecessary time to pre-inspection preparation.	Consolidate inspection history, education materials, photo logs on-line, on one screen with clickable icons.	Organizes existing tools and encourages their use in a time-saving way.
	Not fixing resolvable violations during the inspection defers time-consuming resolution to post inspection follow up.	Resolve more violations on site during inspection.	Spending an extra hour resolving a violation on-site is far less than the weeks it takes to resolve violations post-inspection.
	Too much time spent on resolving violations that don't have an immediate impact on human health and the environment	Minimize post-inspection follow-up on secondary violations (update Hitting the High Points policy).	30% of violations cited are secondary ones. This keeps focus on resolving most important violations.

Activities to Implement Future State	<p>Lean Projects completed</p> <ul style="list-style-type: none">• Authorize electronic signatures for inspection reports.• Pilot pre-inspection information package.• Develop SharePoint document review workflow. <p>Lean projects underway, targeted for completion November 2012 – May 2013:</p> <ul style="list-style-type: none">• Resolve more violations on site.• Create a tiered violation classification system informed by risk (update Hitting the High Points Policy).• Create inspector one-stop shop for inspection preparation.• Document regional approaches to targeting Inspections. <p>Lean projects still to be scoped/scheduled to start in 2013:</p> <ul style="list-style-type: none">• Develop and pilot friendly reminder letter in advance of inspections.• Consolidate/streamline audit forms and checklists.• Simplify photo management.• Identify and share p2 opportunities with facilities.• One toolbox to rule them all (interrelation inspection prep and data tool).																																	
Results to Date	<div><p>Environmental Threats Found and Number of Inspections Performed</p><table><thead><tr><th>Calendar Year Ending December 31</th><th>Percent Chance of an Environmental Threat (blue)</th><th>Number of Compliance Inspections Performed (red)</th></tr></thead><tbody><tr><td>2002</td><td>0.27</td><td>381</td></tr><tr><td>2003</td><td></td><td></td></tr><tr><td>2004</td><td></td><td></td></tr><tr><td>2005</td><td></td><td></td></tr><tr><td>2006</td><td></td><td></td></tr><tr><td>2007</td><td></td><td></td></tr><tr><td>2008</td><td></td><td></td></tr><tr><td>2009</td><td></td><td></td></tr><tr><td>2010</td><td></td><td></td></tr><tr><td>2011</td><td>0.58</td><td>321</td></tr></tbody></table></div>	Calendar Year Ending December 31	Percent Chance of an Environmental Threat (blue)	Number of Compliance Inspections Performed (red)	2002	0.27	381	2003			2004			2005			2006			2007			2008			2009			2010			2011	0.58	321
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Discussion about Results	<p>The percent chance of finding a significant violation stayed nearly steady over the past two calendar years, while the number of inspections increased by 33 percent over the same period. 321 inspections in calendar year 2011 is the highest total since 2004. As the number of inspections increase, we hope to continue to lower the number of significant violations found in coming years.</p> <p>Note: our lean efforts are not yet influencing the above trend lines - the hiring of 4 additional inspectors in 11-13 currently drives these. Once we have all inspector positions filled, then we can measure if our lean actions result in further increased inspections without additional</p>																																	

	resources. The 13-15 biennium will be a better period to judge this.		
Future Action Plan (Milestones)	What?	Who?	When?
	Inspector One-Stop Shop. Consolidate inspection history, education materials, photo logs on-line, on one screen with clickable icons.	Sponsor: Michelle Underwood Project Leads: Jim Pearson/Sharleen Bakeman	Jan 2013
	Targeting Inspections. Document how regions create their inspection lists, including how they select sectors and assign inspectors to do repeat inspections. Share regional reports so each region can learn from others' approach. Evaluate after sharing reports if we need additional work.	Sponsor: K Seiler Project Leads: Darin Rice/Lisa Brown	Nov 2012
	Update Hitting the High Points Policy. Update current CIVs. Create classification system informed by risk. Start with existing EPA and enforcement ranking approaches.	Sponsor: Darin Rice Project Leads: Leslie Morris/Sharleen Bakeman	Dec 2012